

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Carl W. Bass

Plaintiff(s),

**KBS REALTY, AND CAPITAL
ADVISORS/ ~~PETER M. BRENOR~~
~~HIS LEGAL REPRESENTATIVE~~**

Defendant(s).

RECEIVED

AUG 23 2016
8-23-2016
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Case No.

16-cv-08287
Judge Ruben Castillo
Magistrate Judge Sheila M. Finnegan

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

- ① This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Carl William Bass.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

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1. 212.644.6662. ~~KBS REALTY AND CAPITAL ADVISORS / PETER M. BREN~~
 4. Defendant, ~~OR LEGAL REPRESENTATIVE~~ 590 MADISON AVE.
 NEW YORK CITY, N.Y. 10022 (26th Fl.) is
 (name, badge number if known)

☐ an officer or official employed by _____;
 (department or agency of government)

☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CHICAGO - COOK COUNTY, IL. 60661 As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about August 25, 2014 at approximately 11:45 p ☐ a.m. ☒ p.m.
 (month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of Chicago, IL. 60661
500 W. Madison St.
Citigroup Center, in the County of Cook County,
 State of Illinois, at Citigroup Center 500 W. Madison St. (Food Court,
 (identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☐ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☒ conspired together to violate one or more of plaintiff's civil rights;
☒ Other:

I was Illegally Banned out of 2 Public
Accommodations, (the Food Court/Ogilvie Transportation Center),
in the Citigroup Center, at 500 W. Madison St, Chicago, IL. 60661 -
by Security Company Employees whose Company, has a Contract with
the KBS Company.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant

municipality, county or township, which custom or policy is the following: *(Leave blank*

if no custom or policy is alleged): The Defendant (KBS Corp.'s) Security Company (Formerly American Commercial), owned by ABM Ind. Inc., Alleged that I violated somekind of Security Rule, but Security Guard Tina Miller was not even this specific, I was ordered to leave the Building, and NOT

8. Plaintiff was charged with one or more crimes, specifically: Return! EVER!
I was NOT charged with any Crime, the Chicago Police were lied to by Taco Bell's Deontae Henry, he told them, I was (supposedly), "Telephone Harassing him," I was NOT, Mr. Henry LIED to 2 Police Squads of Police! I did NOT know what (SUPPOSED) Crime I SUPPOSEDLY comitted until February 2016, when I got the 2
 9. *(Place an X in the box that applies. If none applies, you may describe the criminal* **FALSE CPD Reports!**
proceedings under "Other") The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

☒ Other: I NEVER Comitted ANY Crime EVER, but I was ORDERED to leave the Citigroup - Center, and NEVER return by THEIR (= KBS Corp.'s Security)!

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

*I have NEVER had the Police called on Me, in my Entire Life, until these Events!

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

I arrived at the Citigroup Center Food Court at 9:30 p.m. August 25, 2014. I sat there at my table, I sat at for 7 YEARS, reading my Chicago Newspapers. At 11:45 p.m. Security Guard Tina Miller came up to me and said, "Carl you're going to have to Leave the Building!" I said, "What's going on?" Guard Tina Miller said, "(Taco Bell's) Deontae Henry has been Telling Me THINGS about You, and You have to Leave the Building!" I said, "Well how long is this going to Last? (me not being able to come into the Building). Guard Tina Miller pointed back at the Taco Bell, and said, "For as long as Deontae Henry works at this Taco Bell, You cannot come back into this Building!" I got up and left the Building. Unbeknownst to Me, Taco Bell's Deontae Henry made his 2ND FALSE CPD, on this Night. *Report

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Because the Defendants (KBS Corp.), has done Nothing My Reputation in the Citigroup Center Food Court is RUINED!!!! I NEVER even got a Phone Call from anybody at the KBS Corp. so they could Investigate this, and Review important Security Video, that would show this All

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☐ No

a Big Lie!!!!

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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Carl Bass

Plaintiff's name (print clearly or type): Carl William Bass

Plaintiff's mailing address: 36 S. KENSINGTON AVE.

City LA GRANGE State IL. ZIP 60525

Plaintiff's telephone number: (224) 830-8145

Plaintiff's email address (if you prefer to be contacted by email): NONE

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.